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November 29, 2016

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Magistrate Judge Karen M. Williams  
District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, New Jersey 08101

RE: *In the Matter of Matthew Carson as Owner of the  
TAMMY LYNN*  
United States District Court, District of New Jersey  
Docket No.: 15 Civ. 7388-NLH-KMW  
Claimants: Joseph and Kathleen Sandefur  
Date of Incident: July 11, 2015  
Our File No.: 000001202 GSR

Dear Judge Williams:

We represent petitioner Matthew Carson in the above-referenced matter. We respectfully submit this request for a stay of the current discovery schedule. Since our last telephone conference with the Court on October 14, the parties have proceeded with an intention to explore mediation. As discussed with your Honor, counsel for Mr. Sandefur subsequently produced two (2) expert disclosures as well updated medical expense and lien information. The parties are now in a position to attempt mediation and are in the process of selecting a mediator.

The current deadline for the completion of pretrial fact discovery is November 30, 2016. In an effort to minimize costs in advance of mediation, there are certain fact discovery items which have not yet been completed. Specifically, additional discovery is necessary regarding plaintiff's prior injury history and prior disability records/award. There is also at least 1 non-party witness that still needs to be deposed. In addition, Mr. Sandefur needs to be examined by an independent medical expert once we have a complete medical history. In the event the mediation is unsuccessful, we will need additional time to complete this discovery. There have been no prior requests for an extension of time to complete discovery.

The parties are currently scheduled for a telephone status conference on January 13, 2017 at 10:30 a.m. In light of the upcoming holidays it may prove difficult to schedule mediation before that date. We therefore respectfully request that the

November 29, 2016

Page 2

conference be converted to a control date for a joint letter report on the status of mediation.

We thank the Court for its time and consideration to this matter.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By:



Guerric S.D.L. Russell

**CC: VIA ECF AND FAX:**

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